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JAN 25 1995

JOHN E. SONNELAND  
President

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

December 13, 1994

Dear Ladies/Gentlemen:

Re: PR Docket 93-144 & 93-253

DOCKET FILE COPY ORIGINAL

This letter is in response to the FCC's Further Notice of Proposed Rule Making released November 4, 1994, response initially by December 5, 1994.

We have standing by reason of SMR frequencies in service at Fancher Beacon (Baldy), north-west of Spokane, Washington; at Monumental Mt. near Colville, Washington; at Bald Mt. near Sandpoint, Idaho; and maintain SMR service for Meadowland, Inc. at Mica Peak, south of Post Falls, Idaho.

Our company objects to the proposed rule making on 5 counts.

1) Based on the auction of narrow band and broad band PCS frequencies, our company or even a consortium of similar companies in the Pacific Northwest, would not remotely have the financial means to compete against Nextel/Motorola and corporations of similar financial depth. Under no circumstances can this proposal be considered a boon or favor to small businesses such as ours.

2) The FCC proposes to continue the freeze on new 800 MHz SMR applications, thus preventing companies such as ours from expanding service to the public. In fact, the FCC recently returned our application for additional frequencies necessary to provide better service to our customer base. A thaw is urgently needed.

3) The proposal to auction the spectrum in which there are hundreds of existing small business licensees (**not to mention tens of thousands of existing small business customers**) in the 861-865 MHz range is unprecedented in FCC actions. The large corporations, who almost surely would be the successful bidders for the proposed spectrum, would be permitted to ignore the 40-mile rule, and to move transmitting sites at their will without prior FCC authorization or review. This is certain to create serious frequency interference problems for existing licensees.

4) Such frequency interference problems, based on our past experience, take many months to resolve through the FCC, during which time we would suffer significant loss of our customer base. Prosecuting such protests would be time-consuming and expensive

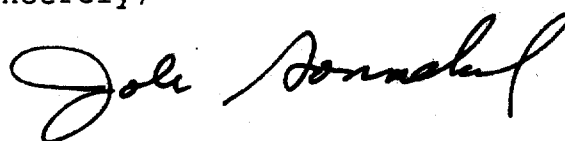
for existing operators. Moreover, even when we could obtain an FCC order to resolve our interference problems, there would be nothing to prevent the MIA licensee from constructing a new facility causing new interference, and forcing us to undertake yet another protest.

5) The end result is that small companies such as ours will be forced out of business, or forced to incur expenses of modifying equipment in an alternate and less suitable spectrum.

In sum, the net effect of the FCC's proposal would be the deterioration of our service to the public through interference, the inability of small companies such as ours to expand, and the loss of inexpensive, basic dispatch services needed by many small business customers.

Finally, the quiet revolution that occurred in the United States this past November 8th underlines the public's disenchantment with pre-emptory regulation such as that proposed in the current rule making. If permitted to take effect, the logical end point would be further FCC regulation, increasing costs of communication to the public, and economic harm to hundreds of small businesses throughout the nation.

Sincerely,

A handwritten signature in cursive script, appearing to read "John E. Sonneland".

John E. Sonneland

Chairman & Commission Members  
Federal Communications Commission  
1919 M Street NW  
Washington, DC 20554

c.c. Northwest Wireless Network